

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	Criminal No. 05-CR-10175-WGY-1
)	
v.)	
)	
NADINE J. GRIFFIN,)	
)	
Defendant.)	

UNITED STATES' PROPOSED VOIR DIRE QUESTIONS

The United States of America, by and through undersigned counsel, hereby files its Proposed Voir Dire Questions for the Court's consideration.

1. Have any of you ever served as a juror:
 - in a civil or criminal case?
 - if so, what court?
 - did the jury reach a verdict?
2. Have you ever testified in court or been a party to any legal proceedings where you had to go to court? If so, do you understand that there is a difference between civil and criminal cases?
3. Have any of you, members of your family, or close friends ever been a party to a lawsuit involving the local, state, or federal government? If so, please explain.
4. Have you or any of your close friends or relatives ever been a victim of a crime? If so, please explain.

5. Have you or any member of your family or any close friend ever had a direct interest in the outcome of a criminal case? If so, might that cause you to be unfair either to the United States or the defendant?
6. Do any of you know the defendant, Nadine J. Griffin, or anyone in her family?
7. The United States is represented in this trial by Christopher J. Maietta and John N. Kane of the United States Department of Justice. Do any of you know them?
8. Jessica Crocker, a Special Agent with the Criminal Investigation Division of the Internal Revenue Service, is also seated at the United States' counsel table and will be assisting in the government's case. Do any of you know Special Agent Crocker, or anyone associated with the Internal Revenue Service?
9. The following people may be called as witnesses in this case. Please raise your hand if, upon hearing the names of the witnesses, you believe that you know any of the witnesses. [Read government's & defendant's witness lists.]
10. Have any of you participated in a multi-level marketing business, or a home-based businesses, which required you to solicit customers over the telephone?
11. Have any of you heard of an organization called Global Prosperity, the Institute for Global Prosperity, or similar names?

12. Have any of you worked as a salesperson, or known someone who worked as a salesperson, or in any other employment capacity, for Global Prosperity, the Institute for Global Prosperity, or similar names?
13. Have any of you been solicited, or participated in or with Global Prosperity, the Institute of Global Prosperity, or similar names?
14. Have any of you participated in financial seminars that are located outside the United States; for instance, in the Caribbean, Mexico, or Aruba?
15. To what extent, if any, have any of you read or heard any publicity or news relating to this trial? Is there anything in particular that you have read or heard that has caused you to form an opinion as to the guilt or innocence of the defendant, or that might influence your deliberations?
16. Do any of you have any personal knowledge of the facts in this case other than what you have heard in this courtroom?
17. Do any of you hold strong personal or philosophical feelings about the tax system of the United States? If so, what are those feelings?
18. Do any of you believe that the income tax laws of the United States are unconstitutional?
19. Do any of you feel that it is wrong for the government to impose income taxes?

20. Do any of you have any disagreement with the idea that everyone is obligated to obey the income tax laws, as well as all other laws of this country?
21. Do any of you feel that violations of income tax laws should not be prosecuted as crimes by the United States?
22. Have you, or your relatives or close friends, ever had a negative experience with the I.R.S. or with an I.R.S. agent?
 - a. If so, how would that affect your ability to hear the evidence in this case?
23. Have any of you had any training in accounting or law?
 - a. What kind of training?
 - b. Would that training affect your ability to follow the court's instructions on the law that should be applied in this case?
24. Do you have any feelings or opinions about the United States government or law enforcement officials, in general, which would affect your ability to be impartial?
25. Do any of you believe that it would be nearly impossible for the government to prove a person's guilt beyond a reasonable doubt?
26. Is there anyone who thinks the burden of proof beyond a reasonable doubt is too heavy or that it is asking too much for the Government to meet this burden?
27. Has any juror had an unpleasant experience with any federal, state, or local law enforcement officer?

28. Have you or any relative or close friend ever been involved in an investigation by federal or state authorities, including any grand jury, congressional, or legislative investigation?
29. Does any juror have any feelings regarding the United States, the U.S. Department of Justice, or other federal agencies that would affect your ability to sit as a juror in this case and listen impartially to the evidence and render a verdict according to that evidence? Have you ever had a dispute with a department or agency of the United States that was not handled to your satisfaction?
30. Do any of you have a philosophical or religious belief that would prevent you from judging the evidence and deciding a person's guilt or innocence?
31. Would any of you be willing to disobey the judge's instructions of law simply because they are different from your own understanding of what the law is or should be?
32. Can any of you think of any reason why you may not be able to render a fair and impartial verdict based solely on the evidence presented if you are chosen to sit on this jury?
33. Do you have any difficulty with your hearing, sight, or any other medical problem which might impair your ability to devote your full attention to this trial?

34. This trial is expected to last approximately eight days. Do any of you anticipate that the duration of this trial would cause any severe hardship or difficulty for you because of your employment, family status, health or other reasons?

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Christopher Maietta
CHRISTOPHER MAIETTA
Trial Attorney
U.S. Department of Justice
Tax Division

By: /s/ John N. Kane
JOHN N. KANE
Trial Attorney
U.S. Department of Justice
Tax Division

CERTIFICATE OF SERVICE

This is to certify that I have this day, July ____, 2006, served upon the person listed below a copy of the foregoing document, "UNITED STATES' PROPOSED JURY INSTRUCTIONS," by mail:

Alan S. Richey, Esq.
P.O. Box 1505
Port Hadlock, Washington 98339

Christopher J. Maietta